

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

CAROLYN PERLIN, individually, and  
on behalf of all others similarly situated,

Plaintiff,

v.

TIME INC., a Delaware Corporation,

Defendant.

Case No. 2:16-cv-10635-GCS-MKM

Hon. George Caram Steeh

**STIPULATION AND ORDER FOR  
EXTENSION OF DISCOVERY DEADLINES**

This Stipulation is entered into by and among Plaintiff Carolyn Perlin (“Plaintiff”) and Defendant Time Inc. (“Time” or “Defendant”) (collectively, the “Parties”), by and through their respective counsel.

WHEREAS, on September 15, 2017, the Parties submitted an Amended Rule 26(f) Report and Discovery Plan, ECF 33 (“Discovery Plan”).

WHEREAS, the Discovery Plan set February 2, 2018, as the deadline for the completion of discovery.

WHEREAS, the Parties have been working diligently to complete discovery.

WHEREAS, due to scheduling conflicts, the Parties require additional time in order to complete the depositions of Plaintiff and Time’s Rule 30(b)(6) representative.

WHEREAS, the Parties have agreed to extend the deadline for the completion of discovery by approximately 30 days until March 5. The Parties have likewise agreed to extend the remaining dates in the Discovery Plan by approximately 30 days.

WHEREAS, the Parties agree, and respectfully request, that the Court extend the deadlines in the Discovery Plan by approximately 30 days as set forth below.

WHEREAS, the instant request is made in good faith and not for undue delay or any improper purpose.

NOW THEREFORE, the Parties stipulate that the remaining deadlines in the Discovery Plan shall be extended as follows:

<b>Deadline to Complete Discovery:</b>	March 5, 2018
<b>Deadline to File Motion for Class Cert.:</b>	April 12, 2018
<b>Deadline to Oppose Class Cert.:</b>	May 14, 2018
<b>Deadline to File Dispositive Motions:</b>	30 days after ruling on class cert.
<b>Pretrial Conference Date:</b>	30 days after ruling on dispositive motions.

**IT IS SO STIPULATED**

Respectfully submitted,

Dated: January 25, 2018

/s/ Jeffrey Landis

Marc Zwillinger

Jeffrey Landis

Nury Siekkinen

Zach Lerner

ZwillGen PLLC

1900 M St. NW, Ste. 250

Washington, DC 20036

(202) 706-5203

marc@zwillgen.com

jeff@zwillgen.com

nury@zwillgen.com

Lara Phillip

Honigman Miller Schwartz

and Cohn, LLP

660 Woodward Avenue

2290 First National Building

Detroit, MI 48226

(313) 465-7400

lara.phillip@honigman.com

*Counsel for Defendant Time, Inc.*

Dated: January 25, 2018

By: /s/ Ari J. Scharg

Ari J. Scharg

EDELSON PC

350 North LaSalle Street, Suite 1300

Chicago, Illinois 60654

Tel: 312.589.6370

Fax: 312.589.6378

ascharg@edelson.com

Henry M. Scharg – P28804  
hmsattyatlaw@aol.com  
LAW OFFICE OF HENRY M. SCHARG  
718 Ford Building  
Detroit, Michigan 48226  
Tel: 248.596.1111  
Fax: 248.671.0335

*Counsel for Plaintiff Perlin and the putative  
class*

IT IS SO ORDERED.

Entered: January 26, 2018

s/George Caram Steeh  
THE HON. GEORGE CARAM STEEH  
UNITED STATES DISTRICT JUDGE